STATE OF CALIFORNIA GEORGE DEUKMEJIAN, *Governor*

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
LOS ANGELES REGION

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LOS ANGELES, CALIFORNIA 90012-4596
(213) 620-4460

December 28, 1988

Charles M. Miller
C.M. Miller Enterprises, Inc.
20415 Prestina Way
Walnut, CA 91789

SOIL REMEDIATION - MONADNOCK COMPANY FACILITY , CITY OF INDUSTRY ( CAO 88-057)

Item No. 3 of the Order required that you " Specifically eliminate the immediate threat of continued infiltration" from the soil excavation of the old barrel storage area. Your revised workplan to perform this requirement was received on December 5, 1988. Our review has been completed and the workplan is approved subject to the following comments:

Deep Soil Borings

1. Adjust the location of boring D-5 and add two shallow borings: a) D-5 should be shifted to the south, away from C-7, b) two 20 foot borings must be emplaced between D-7 and D-6 to verify the earlier boring B-6-2 (samples appear to have been collected in glass jars rather than by using appropriate protocols).

2. The key issue is contaminant distribution not contaminant migration as stated.

3. Samples for laboratory analyses must not be disturbed in the field. Field examination must be made of companion samples.

4. Based on other information supplied to staff from an analogous site, the cleanup level for PCE is no longer 400 ug/kg in the soil.

5. Mg\kg level screening is not adequate for ug/kg level analytical decisions. If the field screening proposed does not provide sufficient sensitivity or if appropriate calibration measures are not followed, then all the samples collected must be analyzed.

Soil Removal

1. Additional soil removal will not be wholly controlled by the seven new, deep, soil borings. B-6-4 exhibited

4650 ug/kg TCE at 20 feet and 650 ug/kg of PCE at 15 feet, which means that additional excavation of soils is already known to be required. Borings such as D-1 will help determine how much additional excavation is necessary.

2. Leachibility determination; evaluation of parameters such as contaminant dispersion, sorption and degradation and; evaluation of the risk to ground water from residual chlorinated organic contaminants in the vadose zone (following remediation) were required by staff. These were believed necessary to set appropriate site specific cleanup levels. None of the parties to the order have performed these.

3. Ajax-Scoville has performed such work in similar fine grained materials downgradient from Monadnock, which indicates that 200 ug/kg of PCE is more appropriate than the 400 ug/kg indicated earlier in the Monadnock investigation. 200 ug/kg will be the required cleanup level at Monadnock unless similar studies are performed for the subject site.

4. Soils must be remediated such that there is no further threat to ground water regardless of cleanup method or combination of methods.

5. Cover for the backfilled area must meet RCRA standards.

6. Adequate description of the proposed vadose zone monitoring must be provided in a supplement, although remedial field work is approved for the existing excavation.

Disposal

1. Further storage of hazardous waste in stockpiles is not acceptable. It must be containerized.

Schedule

1. The proposed scheduled start in January is welcome.

2. Progress reports will be required from you at the following junctures: a) completion of the deep borings and laboratory analysis, b) completion of soil removal, c) completion of backfilling and construction of cover, and d) completion of vadose zone monitoring.

3. This approval is being granted subject to

incorporation and /or response to the comments herein.

4. Completion of each phase of the soil remediation must be approved before initiation of the next.

5. Staff must be notified 5 days in advance of any proposed field work so that someone may be present if desired.

A final report is due to this agency within 14 days of completing field operations. If you have any questions please call Philip Chandler at (213) 620-6091.

ROY R. SAKAIDA
Senior Water Resources
Control Engineer

cc: Mr. Neil Ziemba (T-4-1), Environmental Protection Agency, Region 9
Mr. Nestor Acedara, Department of Health Services, Toxic Substances Control Division
Mr. Bill Jones, Los Angeles County, Department of Health Services, Hazardous Materials Program
Mr. Don Howard, Engineer for Puente Basin Water Master
Mr. Thomas Stetson, Engineer for Main San Gabriel Basin Watermaster
Mr. Ralph Wagner
Mr. Richard Ross, Monadnock